

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection

N580346845

FACILITY: NAGEL PRECISION INC		SRN / ID: N5803
LOCATION: 288 DINO DR, ANN ARBOR		DISTRICT: Jackson
CITY: ANN ARBOR		COUNTY: WASHTENAW
CONTACT: Kurt Marcum , Quality Assurance Manager		ACTIVITY DATE: 11/01/2018
STAFF: Mike Kovalchick	COMPLIANCE STATUS: Compliance	SOURCE CLASS:
SUBJECT: Scheduled Inspection of honing machine manufacturer.		
RESOLVED COMPLAINTS:		

**Minor Source-****Facility Contacts**

Mr. Kurtis Marcum- Quality Assurance Manager

[kmarcum@nagelusa.com](mailto:kmarcum@nagelusa.com)

ph 734-426-1845

Website: [www.nagelusa.com](http://www.nagelusa.com)**Purpose**

On November 1, 2018, I conducted an unannounced compliance inspection of Nagel Precision, Inc. (Company) located in Ann Arbor, Michigan in Washtenaw County. The purpose of the inspection was to determine the facility's compliance status with the applicable federal and state air pollution regulations, particularly Michigan Act 451, Part 55, Air Pollution Control Act and administrative rules.

**Facility Location**

The facility is located in a commercial business park area on the west side of Ann Arbor. See attached aerial view.

**Facility Background**

The facility was last inspected on 9/05/2012 and found to be compliance. The Company does not have any PTI permits.

The Company manufactures a wide array of large custom-designed machines for superfinishing, honing, gun drilling and deep hole drilling primarily for the automobile industry, but also for industries like oil and gas.

**Regulatory Applicability**

Rule 287 (2) (c) permit exemption rule applies to a metal parts paint booth.

Rule 290 applies to a small rust inhibitor dip tank that with an exhaust system without particulate control.

Rule 285 (2) (I) (iii) applies to some wash tanks associated with the inhibitor dip tank.

1 new small 150 KW natural gas fired emergency generators subject to 40 CFR Part 60, Subpart JJJJ Standards of Performance for Stationary Spark Ignition Internal Combustion Engine. (Meeting NSPS requirements satisfies RICE MACT Subpart ZZZZ.)

Rule 281 (2)(h)/Rule 707 applies to approximately 8 small cold cleaners using mineral spirits provided as service via Crystal Clean. (Emissions estimated to be below one ton per year. Lids closed and petroleum distillate is recycled.)

**Arrival & Facility Contact**

Visible emissions or odors were not observed upon my approach to the Company's facility. I arrived at 9:50 am,

proceeded to the facility office to request access for an inspection, provided my identification and spoke with Kurtis Marcum (KM). I informed him of my intent to conduct a facility inspection and to review the various records as necessary.

KM extended his full cooperation and fully addressed my questions.

### **Pre-Inspection Meeting**

I discuss with KM about any changes at the facility that have occurred since the last inspection in 2012. There have been basically no changes regarding air quality emissions with the peak of most recent business cycle recently passed.

KM outlined that they operate a large paint spray booth for the coating of assorted machines and machine parts varying in size. The booth is actually a large room with a bank of fabric filters measuring about 15-20 ft. wide and 12-15 ft. high. They roll the larger machines into the booth using industrial rigging rollers.

The Company also operates a black oxide "STEELKOTE" process which treats steel parts in a pre-cleaner dipping tank, then a dip tank containing this "STEELKOTE" formulation, which contains 80-85% sodium hydroxide, <5-7 % sodium nitrate, and <5-7% sodium nitrite.

I asked KM if they have any emergency generators. KM indicated that they installed one in the last year to provide backup power to the office. It has only been used briefly once and that they have not used it enough to start maintenance on it yet. It is equipped with a non-resettable hour's meter.

### **Onsite Inspection**

KM gave me a brief tour of the facility. The facility appeared to be clean and well maintained with some light chemical odors noted. We first went to the paint booth room. There was a large bank of particulate filters along one wall of the three-sided room with an exhaust system that exited the building through a vertical stack. The filters appeared to be recently changed. There was 2 HVLP guns present and overall it appeared that only very small quantities of paint were being used. It was not operating during the inspection.

Next, we looked at the small dip coating line with that had a horizontally oriented side panel exhaust system that exited the building via horizontal stack with not control. The process was not operating.

KM showed me the natural gas fired emergency generator located just outside the front of the building. It looked new and showed only 13 hours of operation. I informed KM that there are some federal regulations that are applicable to emergency generators such as an hours meter and maintenance records.

There were several other processes at the facility such as some heating, sanding, polishing of metal parts but none of them appeared to exhaust outside the building. Some were controlled by baghouse dust collectors that vented indoors.

### **Recordkeeping/Permit Requirements Review**

Attachment (1) are the SDS's associated with the SteelKote process.

Attachment (2) are the usage amounts of the three different chemicals associated with the SteelKote process for July-September 2018. Between zero and a few gallons a month of usage over the last months and well under the applicable 1000 pounds per month allowable emission levels in Rule 290 (2)(a)(ii) based on ITSL of 20 ug/m<sup>3</sup> for sodium hydroxide, and 10 ug/m<sup>3</sup> for sodium nitrite and Toxics Screen Database footnote #26 applicable for sodium nitrate. (i.e. This toxic air contaminant (TAC) is reasonably anticipated to exist as a particle in the ambient air. )

Attachment (3) are paint usage records for September and October 2018. They are averaging about 10 gallons per month which includes solvent usage which is well under the 200 gallons per month permit exemption. Per KM, they have never used more than 50 gallons in a single month.

### **Post-Inspection Meeting**

I held a brief post-inspection meeting with KM. I indicated that I would be reviewing the records that he gave me for compliance but anticipated that there would be no compliance issues. I thanked KM for his time and cooperation, and I departed the facility at approximately 10:30 am.

**Compliance Summary**

The Company is in compliance.

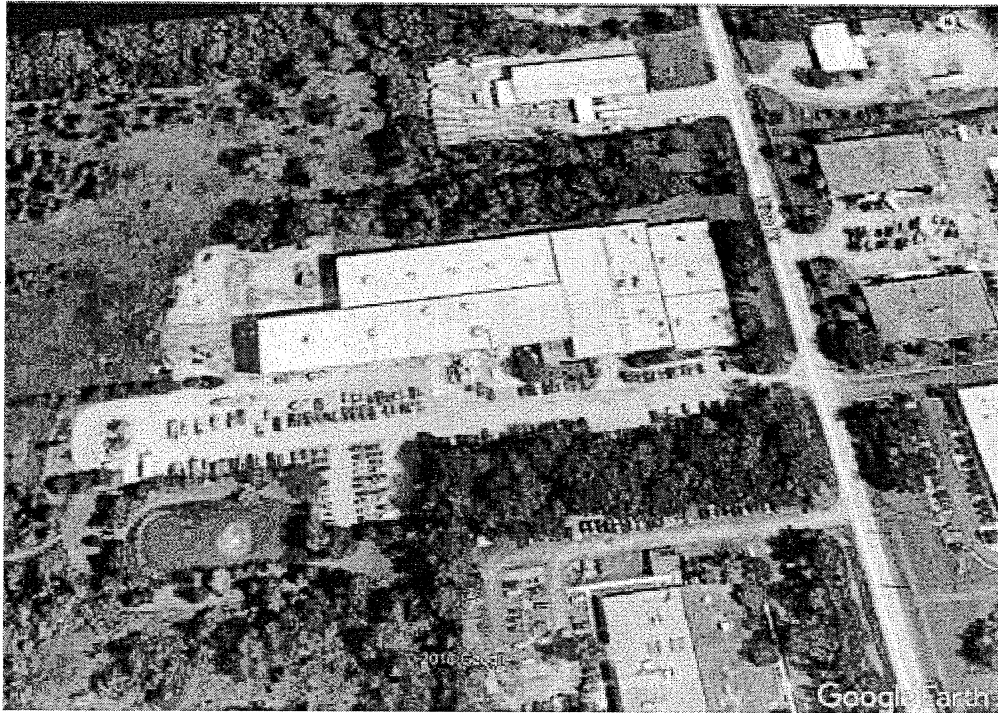


Image 1(Aerial photo) : Aerial photo

NAME M. Kowalchuk

DATE 11/14/2018

SUPERVISOR [Signature]